



EG&amp;G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

March 8, 1991

91-BF-0819

Robert M. Nelson, Jr.  
Manager  
DOE, RFO

Attn: R. J. Schassburger

ACTION DESCRIPTION MEMORANDUM FOR DECONTAMINATION AND DECOMMISSIONING  
OF LIQUID NITROGEN PLANT

Enclosed for your review is the Action Description Memorandum (ADM) for the Decontamination and Decommissioning (D&D) of the old Liquid Nitrogen Plant, Building 223, authorization number A01590, at the Rocky Flats Plant. A Memo-To-File (MTF) was issued on the new Liquid Nitrogen Plant ADM on April 12, 1990. The new Liquid Nitrogen Plant ADM did not include the strip-out of the old equipment. In retrospect, it would have been preferable to have included the strip-out in the original ADM.

The Department of Energy's Rocky Flats Office (DOE, RFO) may want to review the existing ADM and MTF for the new Liquid Nitrogen Plant and the ADM for the strip-out for segmentation issues. Paragraphs 1 and 3 in Council on Environmental Quality (CEQ) regulation 1508.25 address the segmentation issue: (1) related actions should be discussed in the same impact statement, and (3) similar actions, which, when considered with other proposed agency actions, provide a basis for evaluating combined environmental consequences, such as common timing or geography. This regulation discourages the separation of related actions in NEPA documentation.

The attached ADM can be used as an addendum to the prior Liquid Nitrogen Plant ADM, or as a separate ADM, depending on DOE, RFO's conclusions on the segmentation issue. Please review the attached ADM for the D&D of the old Nitrogen Plant for a determination of the level of NEPA documentation required.

If further discussion is required, please contact Kathy London of my staff at 273-6189.

441

## CLASSIFICATION:

UNCLASSIFIED  
CONFIDENTIAL  
SECRET

AUTHORIZED CLASSIFIER

DATE 3/14/91  
IN REPLY TO LTR NO.J. M. Kersh  
Associate General Manager  
Environmental Restoration and Waste Management

APM:mja

Orig. and 1cc - R. M. Nelson, Jr.

Attachment:  
As StatedCC:  
K. S. MurthyPC:  
LTR APPROVALS:  
DATE 3/14/91  
ORIG & TYPE INITIALS

ADMIN RECORD

ACTION DESCRIPTION MEMORANDUM  
DECONTAMINATION AND DECOMMISSIONING OF  
BUILDING 223 LIQUID NITROGEN PLANT

Authorization No. A01590

EG&G Rocky Flats, Inc.  
Rocky Flats Plant

Operating Contractor for  
U. S. Department of Energy

December 1990

Preparer Andrew P. McLean Kenneth C. Hogg  
Facilities Project Management\* G. David Elliott 1/16/91  
Safety Analysis Engineering\* Ernest P. Ernst 1/16/91  
Legal\* John Carro 1/30/91  
NEPA Division\* K. Gordon 1/16/91  
Manager, NEPA Division Stephen M. Nestor 2/27/91  
Director, Environmental Restoration \_\_\_\_\_

• NEPA Compliance Committee

Reviewed for Classification

By: RC [Signature]

Date: 3/1/91

## ADM DECONTAMINATION AND DECOMMISSIONING OF BUILDING 223 LIQUID NITROGEN PLANT

### 1.0 PURPOSE:

The purpose of the Action Description Memorandum (ADM) is to provide sufficient information to permit a reasonable determination of the level of NEPA documentation required in compliance with DOE orders 5440.1C and AL5440.1B, "Implementation of the National Environmental Policy Act (NEPA)."

### 2.0 PROPOSED ACTION:

The proposed action includes the total disassembly and removal of the present liquid nitrogen plant designated as building 223. The plant is owned by Air Products, Inc., of Allentown, Pennsylvania, and will be decommissioned four months after the new replacement plant is in operation, which should be June 1991.

### 2.1 NEED FOR ACTION:

The equipment inside of the old liquid nitrogen plant is no longer in use and has been requested to be returned to Air Products, Inc. Air Products, Inc. owns the equipment.

### 2.2 LOCATION OF THE ACTION:

The Rocky Flats Plant is located in northern Jefferson County, approximately 16 miles northwest of downtown Denver, Colorado. The proposed action is located in the northwest section of the plant in the building 371 parking lot. The east half of the parking lot will be used for the nitrogen plant. This site is located on Solid Waste Management Unit (SWMU) 117.1.

### 2.3 CONCISE DESCRIPTION OF THE PROPOSED ACTION:

The present site encompasses approximately 10,000 sq. ft. and is enclosed by a chain link fence. Equipment within the area consists of:

- Compressor/control building and crane
- Main air compressor and motors
- Freon chiller
- Cooling tower and cooling water pumps
- Transformers
- Main control panel
- Valves and instruments
- HVAC equipment
- Above ground piping

The plant is a self-contained unit which supplies nitrogen to meet Rocky Flats Plant (RFP) requirements for inert gas. Demolition will not occur until the new plant is operational and has proven itself reliable. Construction of the of the new plant received a memo-to-file in a previous DOE determination.

All of the concrete floors, foundation, and footings will remain in place, all buried conduit and plumbing will be capped off and abandoned in place. No ground will be disturbed during demolition, as the area has been designated a SWMU.

## 2.4 NO ACTION ALTERNATIVE:

RFP would have to purchase the existing plant from the owner, Air Products, Inc., and determine the disposition of the equipment or leave it to decay in its current location.

## 3.1 CONSTRUCTION ISSUES:

This action consists of disassembly and removal of the present nitrogen facility. The concrete pads and foundations will not be removed, so no disturbance of the soils should occur. Some small components which are not salvageable will be hauled to the RFP landfill.

A large crane will be brought in to load the storage tanks, motors, compressors, etc. for removal. This will be accomplished on weekends so as not to disrupt other operations and to reduce the construction safety hazard to personnel in the area. Power shut down to the plant will be performed in accordance with established RFP procedures.

### 3.1.1 RADIATION SAFETY AND CONFINEMENT:

All equipment leaving the plantsite will be monitored for any radioactive contamination. Since all components are above ground, no problems are anticipated, however; if problems do arise, contaminated equipment will be handled as required by DOE orders and RFP procedures.

### 3.1.2 EXPLOSION:

There are no unique explosive hazards associated with the disassembly of the nitrogen plant.

### 3.1.3 FIRE:

Other than from commonly encountered construction hazards, there are no unique fire hazards associated with this action. Administrative controls will be required to avoid buildup of fire fuel during disassembly.

### 3.1.4 HIGH VOLTAGE OR CURRENT:

Voltages and current used for this action are typical of those used throughout the plant and are common hazards of industry.

### 3.1.5 HAZARDOUS WASTE, MATERIAL AND OTHER SUBSTANCES:

The following list of chemicals, as provided by Air Products, Inc., will be in place during disassembly and removal of the liquid nitrogen plant.

- Regal RSO 46 0.1, coolant oil, 150 gallons
- Regal RSO 68 0.1, coolant oil, 150 gallons

All coolant oil will be sampled for hazardous constituents and radioactivity prior to disposal. If radioactivity or hazardous constituent levels exceed regulatory levels, the coolant oil will be retained on plantsite and treated and disposed in accordance with all applicable regulations. If radioactivity or hazardous constituent levels are less than regulatory levels, the coolant oil will be properly disposed offsite by Air Products Inc. Proper mechanical and administrative controls will be utilized for spill prevention and control.

#### 3.1.6 MECHANICAL:

There are no mechanical hazards associated with the disassembly of the Nitrogen Plant other than the usual industrial hazards associated with Materials Transport and Handling.

#### 3.1.7 OTHER:

There are no other hazards associated with the disassembly of the liquid Nitrogen Plant.

#### 3.2 OPERATIONAL ISSUES:

There are no operational issues associated with this project.

#### 3.3 POSTULATED ACCIDENT:

This project involves only hazards of a type and magnitude routinely encountered at the RFP and in general industry. No additional safety analysis is required (per DOE order 5481.1B "Safety Analysis and Review Systems"). Maximum Credible Accidents (MCAs) and risk to the public postulated in the final Environmental Impact Statement for RFP (RFP EIS0064) are not impacted or significantly by this proposed action.

#### 4.0 REGULATORY COMPLIANCE

##### 4.1.1 CONSTRUCTION:

Any excavation within SWMU 117.1 will be done in accordance with all State, EPA, and RFP procedures. Basic requirements for construction within the SWMU will include but are not limited to the following:

- Any construction within the SWMU will be done in conjunction with a site sampling plan to be presented to the Environmental Protection Agency (EPA). Following review of the plan, site characterization sampling will be completed and a health and safety plan developed for construction work.
- Soil from the SWMU will not be removed from the SWMU. Deposition of soil will be done in a manner as to prohibit its spread (by wind, erosion, etc.) outside of the SWMU boundary.

##### 4.2 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES):

The proposed action will not impact generated liquid effluent and therefore, will not impact the plant EPA National Pollutant Discharge Elimination System Permit.

##### 4.3 CLEAN AIR ACT (CAA):

Air quality could be temporarily impacted as a result of the disassembly actions. Suspension of particulates to the atmosphere will be controlled to the extent necessary, through dust suppression techniques and monitored through ambient air monitoring, to ensure adequate control measures are being taken, and should have little impact.

#### 4.4 NEPA SPECIFIC CONSIDERATIONS:

The proposed action is categorized as further development within RFP site. There will be no adverse effect on:

- Wetlands
- Floodplains
- Historical, cultural, or archaeological resources
- Threatened and endangered species

Consultation with the U. S. Army Corps of Engineers was conducted in the Fall of 1989. The general location of Jurisdictional Wetlands on plantsite were characterized. It has been subsequently determined that the proposed action is not located in, nor in a position to have an effect upon known Jurisdictional Wetlands.

In a letter to A. E. Whiteman, Manager of DOE/RFP office, the Colorado State Historical Presentation Officer, B. Sudler, stated that "there will be no effect to significant cultural resources by further development within Rocky Flats Plant, provided [two specific sites] are avoided." These sites were identified in an archaeological and historical survey of selected parcels within DOE/RFP, and will not be affected by the proposed action.

The U. S. Fish and Wildlife Service has identified the bald eagle and black-footed ferret as endangered species of interest at the plant. This action would not be considered to impact the bald eagle habitat. Surveys for black-footed ferrets would be required only if prairie dog colonies would be affected. The proposed action is not to be in an area of current or potential colonization by prairie dogs.

The proposed action will not impact Indian lands or religious sites.

#### 4.5 PERMIT SUMMARY:

No new or modified permit will be required to complete this project.

#### 5.0 FISCAL AND SCHEDULE INFORMATION:

The cost and schedule will be developed based on plant priorities.